



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 500
DENVER, CO 80202-2466
<http://www.epa.gov/region08>

Ref: 8EPR-SR

February 4, 2002

Mr. Sven Rodenbeck
ATSDR
1600 Clifton Road
Executive Park Building 31 (MS-E10)
Atlanta, GA 30333

RE: Vasquez Boulevard/ Interstate 70 (VB/I-70)
NPL Site

Dear Sven:

Thank you for providing EPA an opportunity to review the material you are preparing for the March 7-9 2002 poster sessions for the community affected by the VB/I-70 Site.

This letter provides EPA's comments for your consideration. Our goals in providing these comments are to help EPA and ATSDR avoid issuing confusing public health messages, improve the accuracy of the information provided to the general public, and coordinate the efforts of our agencies as well as the Colorado Department of Public Health and Environment and the City of Denver in addressing the public health concerns at the VB/I-70 Site.

EPA notes that the January 25 version of the "arsenic and lead letter" states:

"The Agency for Toxic Substances and Disease Registry (ATSDR) looked at results from the soil samples that the EPA collected from your yard and found that the arsenic levels in soil is a public health concern for preschool children who eat soil while playing. We know that some preschool children will eat soil as a part of their normal behavior while playing and exploring their work. However, when children eat soil that contains high level of arsenic, they might become sick."

This language is not consistent with what is written in the initial release version of the ATSDR Public Health Assessment (PHA) for VB/I-70. The PHA is careful to state that ATSDR is concerned about the public health hazards to "soil-pica children who ingest unusually large amounts of soil". This population of children is not the same as "preschool children" specifically identified in the letter. The letter does not make this very important distinction and suggests that any parent of a preschool child who receives the letter should be concerned that his or her child



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might become sick from what is in their yard regardless of that child's behavior. We don't believe that the PHA contains information which justifies causing such alarm.

EPA requests that you please modify the language in the second line to accurately reflect the PHA. We suggest it should read "...arsenic levels in soil are a public health concern for preschool children with soil pica behavior who eat unusually large amounts of soil" to be consistent with the PHA..

Even with this modification, the letter is unclear about how much soil a child would have to ingest for there to be a public health concern. While we understand and agree that the amount of soil ingested by soil pica children is currently not known, ATSDR made some assumptions about soil ingestion rates in order to determine what could be a public health concern. Parents who receive this letter will want to know how much soil ingestion is considered by ATSDR to be a public health concern. If there is a public health concern specific to soil pica behavior EPA believes that a clear definition of the behavior needs to be provided.

As a result of past discussions between EPA and ATSDR about the VB/I-70 Site, EPA understood that the two agencies are in agreement that children who do not have soil pica behavior are not at risk at VB/I-70 even for short-term, higher than normal exposures such as might occur during the summer months. This is supported by EPA's analysis of this scenario in the final Baseline Human Health Risk Assessment for the VB/I-70 Site. That analysis indicates that EPA's removal actions in 1998 and 2000 addressed these short term risks by removing soil from yards where arsenic exposure point concentrations exceeded 400 parts per million. The only remaining public health concern for children from exposure to arsenic in soil at the VB/I-70 Site is the possible exposure of children with soil pica behavior.

The PHA is very careful to communicate the uncertainties in the assessment of public health implications to children with soil pica behavior at the VB/I-70 site. The uncertainties are important and very difficult to communicate in a letter to a resident. EPA suggests that discussions about soil pica behavior and the associated potential risks and uncertainties are better discussed with residents during the community meeting which is announced in the letter. Please consider modifying the letter to simply inform residents that the draft PHA has been released, that ATSDR is seeking public comment on the assessment, and that ATSDR will be available at community meetings to discuss the findings. EPA believes it would benefit the community to also inform them that ATSDR is working with EPA, the Colorado Department of Public Health and Environment, and the Denver Department of Public Health and Environment on plans to address any public health concerns identified in the PHA. Such a letter could be mailed to everyone in the VB/I-70 Site.

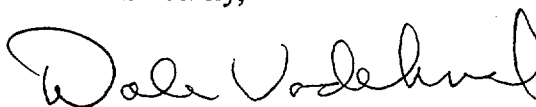
We understand that ATSDR's proposed letter is intended to contain a health message based on the draft PHA specific for the arsenic and lead levels found in soil at each property sampled by EPA. We ask you to consider whether this is appropriate at a time when the PHA is still in draft form and ATSDR is seeking public comment. An individual letter containing a health

message may be more appropriate when the PHA is released in its final form, in case there are changes to the assessment as a result of public comments.

Regarding some of the other materials provided for review, EPA notes that fact sheet titled "Arsenic in Soil at VBI70" is also not consistent with the information in the PHA. The fact sheet contains the statement "arsenic levels in the soil at about 260 properties in the neighborhoods are at levels high enough to be a concern for adults". The PHA states that there is a public health concern about cancer at 40 properties and a concern about possible non-cancer health effects to adults at 45 properties. Please correct the fact sheet to make it consistent with the draft PHA.

EPA appreciates that opportunity to comment on these important materials. I look forward to discussing these comments with you. I understand a conference call has been arranged on February 5 at 3:00pm Eastern Time. In the meantime, if you have any questions or concerns, please call me at (303)312- 6761.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale Vodehnal". The signature is fluid and cursive, with the first name "Dale" and last name "Vodehnal" clearly distinguishable.

Dale Vodehnal
Superfund Program Director

cc: Chris Poulet
Rick Gillig
Henry Falk
VB/I-70 Working Group